Mine file: act/023/003
copy for S. Linner
f. Jensen
L. Kunzler
LD3

BRUSHWELLMAN
ENGINEERED MATERIALS

Brush Wellman Inc.
67 West 2950 South
Salt Lake City, UT 84115
Phone 801/467-5441

October 26, 1987

Mr. Lowell P. Braxton
Administrator, Mined Land Reclamation Program
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Dear Lowell:

Thank you again for taking the time to meet with Lee Davis, Bob Bayer and me last week. We appreciate having the opportunity to explain our position regarding revegetation of the existing dump surfaces at the Topaz Mining Property.

As we said during the meeting, Brush Wellman is not in agreement with the recommendations for revegetation of the existing, tuff-covered mine dumps that were made in your letter of September 22 and in memorandum from Mr. Frank Jensen that accompanied that letter. Brush Wellman's position regarding the revegetation of tuff-covered dumps remains unchanged and we reiterate our request for a full variance from revegetation of these dumps.

While we appreciate Mr. Jensen's desire to contribute to the reclamation effort at the mine, it appears that the results of the analysis of past revegetation plots and studies of soil chemistry were not considered as part of his evaluation. In addition, the vegetative conditions depicted by the photographs in his memorandum might lead to misunderstandings of the past revegetative success by readers relatively unfamiliar with the site. For example, the cluster of saltbush shown on the photograph on page 6 that Mr. Jensen describes as occurring on the tuff-covered surface of the North Blue Chalk Dump test plot actually occurs on slopes where the tuff cover has been eroded and plants are growing in the exposed, blocky rhyolite dump material. Most of the vegetation shown in the photographs is halogeton and the example of a successful wheatgrass plant in the photo on page 10 is not growing in dump material but in native soil. Again, we see nothing in Mr. Jensen's work that refutes our previous evaluation of former revegetation plot success and mine dump soil chemistry. These studies demonstrated that revegetation of the existing tuff-covered mine dumps is not reasonably possible.

As pointed out during our meeting, of the existing dump areas which total approximately 433 acres, only 167 acres or 39% are tuff-covered. The remainder of the dump surfaces are composed of hardened rhyolite overburden. The rhyolite-covered dump surfaces are extremely hard and cannot be ripped, furrowed and/or baffled as proposed in Frank Jensen's memorandum. The changes we're proposing in our mining and disposal practices will further reduce the tuff-covered dump area.

We're eager, as is the Division, to move ahead with finalizing Brush's Reclamation Plan on the Topaz Mining Property and have its preparation behind us. Upon notification of your approval of the revision as submitted in our recent Draft revision, including the requested variances, we'll make the agreed upon changes to the Draft, prepare estimates on total reclamation costs for surety purposes and submit a complete package to the Division.

The final package will contain copies of all data submitted to-date. We can then assist the Division in cleaning up its files by eliminating any duplication of material in the Division's file.

We look forward to your reply.

Sincerely yours,

BRUSH WELLMAN INC.

Kenneth Poulson
Vice President
Mining & Exploration

KP/dt

cc: JBR Consultants, Bob Bayer
Mined Land Reclamation File